

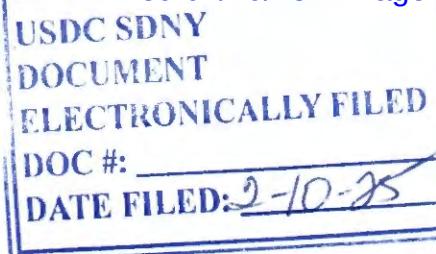
**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION
OF THE KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX REFUND
SCHEME LITIGATION

This document relates to:

19-cv-01785; 19-cv-01867; 19-cv-01893;
19-cv-01781; 19-cv-01783; 19-cv-01866;
19-cv-01895; 19-cv-01794; 19-cv-01865;
19-cv-01904; 19-cv-01798; 19-cv-01869;
19-cv-01922; 19-cv-01800; 19-cv-01788;
19-cv-01870; 19-cv-01791; 19-cv-01792;
19-cv-01928; 19-cv-01926; 19-cv-01868;
19-cv-01929; 19-cv-01803; 19-cv-01806;
19-cv-01906; 19-cv-01801; 19-cv-01894;
19-cv-01808; 19-cv-01810; 19-cv-01809;
18-cv-04833; 19-cv-01911; 19-cv-01898;
19-cv-01812; 19-cv-01896; 19-cv-01871;
19-cv-01813; 19-cv-01930; 19-cv-01815;
19-cv-01818; 19-cv-01931; 19-cv-01918;
19-cv-01873; 19-cv-01924; 19-cv-10713.



MASTER DOCKET

18-md-2865 (LAK)

JOINT STIPULATION

IT IS HEREBY STIPULATED AND AGREED by and among counsel for Plaintiff Skatteforvaltningen (“SKAT”) and Defendants¹ that:

1. Defendants are Richard Markowitz, Jocelyn Markowitz, Avanix Management LLC Roth 401(K) Plan, Batavia Capital Pension Plan, Calypso Investments Pension Plan, Cavus Systems LLC Roth 401(K) Plan, Hadron Industries LLC Roth 401(K) Plan, RJM Capital Pension Plan, RJM Capital Pension Plan Trust, Routt Capital Pension Plan, Routt Capital Trust, John van Merkensteijn, III, Elizabeth van Merkensteijn, Azalea Pension Plan, Basalt Ventures LLC Roth 401(K) Plan, Bernina Pension Plan, Bernina Pension Plan Trust, Michelle Investments Pension Plan, Omineca Pension Plan, Omineca Trust, Remece Investments LLC Pension Plan, Starfish Capital Management LLC Roth 401(K) Plan, Tarvos Pension Plan, Voojo Productions LLC Roth 401(K) Plan, Xiphias LLC Pension Plan.



1. On January 14, 2025, Plaintiff's Exhibit 2215, SKAT's summary exhibit of net proceeds received, was received into evidence provisionally. *See Transcript of Record at 577, In re Customs and Tax Administration of the Kingdom of Denmark (Skatteforvaltningen) Tax Refund Scheme Litigation.*
2. Plaintiff's Exhibit 2215 was to be updated to reflect the Parties' agreement regarding the analysis of the amounts received. *Id.*
3. On January 28, 2025, Plaintiff's Exhibit 2287, Joint Stipulation Regarding Net Receipts by Pension Plans, was received into evidence as a replacement of Plaintiff's Exhibit 2215. *Id.* at 1804.

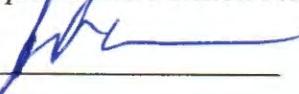
Dated: New York, New York
February 10, 2025

By: /s/ 
Marc A. Weinstein
HUGHES HUBBARD & REED LLP
One Battery Park Plaza
New York, NY 10004-1482
Telephone: (212) 837-6000
Fax: (212) 422-4726
marc.weinstein@hugheshubbard.com

*Counsel for Plaintiff Skatteforvaltningen
(Customs and Tax Administration of the
Kingdom of Denmark)*

By: /s/ 
Sharon L. McCarthy
Nicholas S. Bahnsen
Daniel C. Davidson
KOSTELANETZ LLP
7 World Trade Center, 34th Floor
New York, New York 10007
Telephone: (212) 808-8100
smccarthy@kostelanetz.com

*Counsel for Defendants John van Merkensteijn,
III, Elizabeth van Merkensteijn, Azalea Pensión
Plan, Basalt Ventures LLC Roth 401(K) Plan,
Bernina Pension Plan, Bernina Pension Plan
Trust, Michelle Investments Pension Plan,
Omineca Pension Plan, Omineca Trust, Remece
Investments LLC Pension Plan, Starfish Capital
Management LLC Roth 401(K) Plan, Tarvos
Pension Plan, Voojo Productions LLC Roth
401(K) Plan, Xiphias LLC Pension Plan*

By: /s/ 

Boyd M. Johnson
Peter G. Neiman
Alan E. Schoenfeld
Nelson S. Castaño
WILMER CUTLER PICKERING
HALE AND DORR LLP
7 World Trade Center
250 Greenwich Street
New York, NY 10007
(212) 230-8800
Boyd.Johnson@wilmerhale.com
Peter.Neiman@wilmerhale.com
Alan.Schoenfeld@wilmerhale.com

Andrew S. Dulberg
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, MA 02109
(617) 526-6352
Andrew.Dulberg@wilmerhale.com

Brittany R. Warren
WILMER CUTLER PICKERING
HALE AND DORR LLP
2100 Pennsylvania Ave NW
Washington, DC 20037
(202) 663-6772
Brittany.Warren@wilmerhale.com

*Attorneys for Richard Markowitz, Jocelyn
Markowitz, Avanix Management LLC Roth
401(K) Plan, Batavia Capital Pension Plan,
Calypso Investments Pension Plan, Cavus
Systems LLC Roth 401(K) Plan, Hadron
Industries LLC Roth 401(K) Plan, RJM Capital
Pension Plan, RJM Capital Pension Plan Trust,
Routt Capital Pension Plan, Routt Capital Trust*

SO ORDERED
LEWIS A. KAPLAN, USDI
2/10/25